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Attorneys for Numerous Fire Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
Jointly Administered)

(Jointly Administered)

**JOINDER ON BEHALF OF NUMEROUS
FIRE CLAIMANTS IN OBJECTION OF
THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS TO
CONFIRMATION OF DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION DATED
MARCH 16, 2020**

Date: May 27, 2020
Time: 10:00 a.m.
Judge: Hon. Dennis Montali
Place: Telephonic Only

Re: Docket No. 7306

1 **I. ARGUMENT**

2 Undersigned counsel submits this joinder in the TCC’s objection to confirmation of the
3 plan of reorganization (the “Plan”) [Dkt. 7306] on behalf of Creditors Kevin Burnett, Leslie
4 Moore, Darwin Crabtree, Sandra Crabtree, Joseph Garfield, Robert Eldridge, Benjamin
5 Greenwald d/b/a Greenwald Pest Defense; Lore Olds d/b/a Sky Vineyards, Skyla Olds, Nancy
6 Hitchcock, Herman Bossano, Rebecca Bailey, Ph.D. d/b/a It’s Mine Don’t Touch Trust and
7 Transitioning Families, and Charles Holmes, as well as Angela Loo, a member of the Tort
8 Claimants Committee (the “TCC”) in her individual capacity, and numerous additional Claimants
9 who are victims of the Camp and North Bay Fires asserting claims for wrongful death, personal
10 injury, and loss of homes, businesses, property and livelihood against PG&E (collectively, “Fire
11 Claimants”).

12 Fire Claimants join in the TCC’s objections in order to ensure that if the Plan is
13 confirmed, it is confirmed with the necessary and appropriate terms, conditions, and orders to
14 attain maximum real value to the Fire Victims; fair allocation among Fire Victim claimants; and
15 cost-effective and transparent administration by the appointed and retained neutrals, under the
16 ongoing jurisdiction of and accountability to the court, to assure like treatment of similar claims,
17 maximize recoveries to all Fire claimants, and avoid the dilution of their claims by unreasonable
18 expense.

19 Dated: May 15, 2020

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP

22 By: /s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

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JOINDER ON BEHALF OF
NUMEROUS FIRE CLAIMANTS

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/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser